

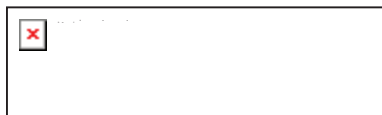
EXHIBIT D

EXHIBIT D

From: Sarah A. Zylstra <szylstra@boardmanclark.com>
Sent: Wednesday, August 17, 2022 2:35 PM
To: Ingrisano, Jonathan; Noel Sterett
Cc: Tanner G. Jean-Louis; Morgan Rose
Subject: RE: Edgewood v. City of Madison [GK-Active.FID3018047]

[EXTERNAL] This message originated from outside your domain.

Yes, correct. My paralegal will send those out later today.



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From: Ingrisano, Jonathan <jingrisa@gklaw.com>
Sent: Wednesday, August 17, 2022 1:33 PM
To: Sarah A. Zylstra <szylstra@boardmanclark.com>; Noel Sterett <nsterett@daltonmich.com>
Cc: Tanner G. Jean-Louis <TJeanLouis@boardmanclark.com>
Subject: RE: Edgewood v. City of Madison [GK-Active.FID3018047]

Sarah:

Thanks. No further waiver of any privilege, correct? The documents you are producing will not be considered privileged.

Jonathan

Jonathan Ingrisano | Attorney
414.287.9611 direct | jingrisa@gklaw.com



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From: Sarah A. Zylstra <szylstra@boardmanclark.com>
Sent: Wednesday, August 17, 2022 1:30 PM
To: Ingrisano, Jonathan <jingrisa@gklaw.com>; Noel Sterett <nsterett@daltonmich.com>

Cc: Tanner G. Jean-Louis <TJeanLouis@boardmanclark.com>

Subject: Edgewood v. City of Madison

[EXTERNAL] This message originated from outside your domain.

Jonathon,

I have the documents related to Strange ready for production. Prior to sending those to you, I want to make sure that our same stipulation applies, that is, that you agree that our production of these documents does not operate as a wholesale waiver of the attorney-client privilege. I am not looking for you to concede that something is privileged but only agreement that you will not contend that our responses/production operate as a waiver of the privilege.



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